

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

## WORLDS.COM INC.,

Plaintiff,

V.

NCSOFT CORP.,

**Defendant.**

CASE NO. C 09-01982 MHP

## **JOINT STIPULATION REGARDING DISCOVERY PLAN**

Judge: Hon. Marilyn H. Patel  
Courtroom 15, 18th Floor

Pursuant to the Court's guidance on December 7, 2009, Worlds.com, Inc. ("Worlds.com") and NCsoft Corporation ("NCsoft") submit the following stipulation regarding the following modifications to the joint Discovery Plan:

1. Worlds.com shall produce all documents called for by Patent L.R. 3-2, including all documents concerning conception/reduction to practice, by December 18, 2009.

2. NCsoft shall serve contentions and produce documents pursuant to Patent L.R. 3-3 and 3-4 by January 15, 2009.

3. The remaining discovery schedule shall be amended as follows:

<b>Event</b>	<b>Original Date</b>	<b>Stipulated Date</b>
Proposed Terms for Construction (Patent L.R. 4-1) due	December 18, 2009	January 22, 2010
Preliminary Claim Construction (Patent L.R. 4-2) due	January 15, 2010	February 19, 2010

	<b>Event</b>	<b>Original Date</b>	<b>Stipulated Date</b>
1	Joint Claim Construction and claim construction expert reports (Patent L.R. 4-3) due	February 26, 2010	April 2, 2010
2	Last Day for discovery relating to Claim Construction (Patent L.R. 4-4)	April 5, 2010	May 10, 2010
3	Opening Claim Construction Brief (in compliance with Patent L.R. 4-5(a)) due	April 26, 2010	May 31, 2010
4	Opposing Claim Construction Brief(s) (in compliance with Patent L.R. 4-5(b)) due	May 14, 2010	June 18, 2010
5	Reply Claim Construction Brief(s) (in compliance with Patent L.R. 4-5(c)) due	May 25, 2010	June 29, 2010
6	Claim Construction Hearing (in compliance with Patent L.R. 4- 6)	June 8, 2010, or at the Court's convenience	July 13, 2010, or at the Court's convenience
7	Last day to disclose reliance on advice of counsel	(50 days after <i>Markman</i> ruling)	(50 days after <i>Markman</i> ruling)
8	Close of Fact Discovery	(75 days after <i>Markman</i> ruling)	(75 days after <i>Markman</i> ruling)
9	Expert reports on issues for which a party bears the burden of proof	(4 weeks after close of fact discovery)	(4 weeks after close of fact discovery)
10	Rebuttal expert reports	(10 weeks after close of fact discovery)	(10 weeks after close of fact discovery)

<b>Event</b>	<b>Original Date</b>	<b>Stipulated Date</b>
Close of expert discovery	(14 weeks after close of fact discovery)	(14 weeks after close of fact discovery)
Last day to file dispositive motions	(16 weeks after close of fact discovery)	(16 weeks after close of fact discovery)
Pre-trial conference	(30 weeks after close of fact discovery, or at the Court's convenience)	(30 weeks after close of fact discovery, or at the Court's convenience)
Trial	(34 weeks after close of fact discovery, or at the Court's convenience)	(34 weeks after close of fact discovery, or at the Court's convenience)

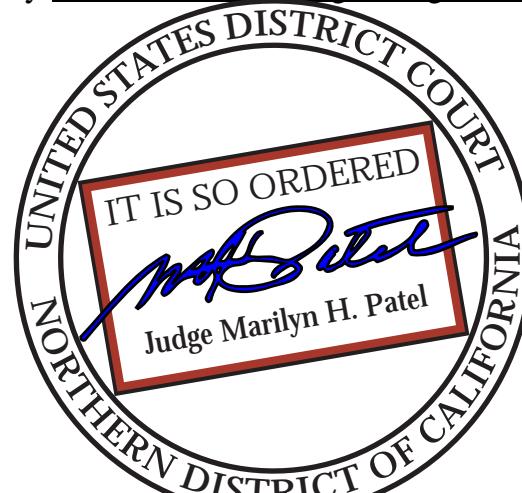
Dated: December 10, 2009

Respectfully submitted,

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